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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

LD, DB, BW, RH, and CJ, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

UNITEDHEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation,
UNITED BEHAVIORAL HEALTH, a
California Corporation, and MULTIPLAN,
INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
OMNIBUS STIPULATION AND OMNIBUS
MOTION ON DISPUTED SEALING
REQUESTS**

Hon. Yvonne Gonzalez Rogers

Hearing: None Set

Complaint filed: April 2, 2020

Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH, and CJ, and Defendants United Behavioral Health,
 2 UnitedHealthcare Insurance Company, and MultiPlan, Inc. (together, “Defendants”), collectively the
 3 “Parties,” to the above-entitled action jointly submit this stipulation pursuant to the Post-Briefing
 4 Omnibus Sealing Procedures in this Court’s Standing Order in Civil Cases. In further support of this
 5 Stipulation, the Parties state as follows:

6 **WHEREAS**, on February 13, 2024, the Court issued its Order Granting Modified Sealing
 7 Procedures requiring the Parties to “jointly file an omnibus sealing motion within 14 days after the
 8 conclusion of the briefing sequence” (Dkt. 399 at 3);

9 **WHEREAS**, on June 10, 2024, Plaintiffs filed their Opposition to Defendants’ Administrative
 10 Motion for Leave to File Sur-Reply (Dkts. 436, 437), which concluded the briefing sequence on class
 11 certification and triggered the 14-day deadline for the omnibus sealing motion, which landed on June
 12 24, 2024;

13 **WHEREAS**, the Court’s Standing Order in Civil Cases allows the Parties “by stipulation filed
 14 on the docket, [to] extend the time to file the Omnibus [Sealing] Stipulation and Omnibus Motion[s on
 15 Sealing Disputes] to 21 days after the conclusion of briefing,” which would be July 1, 2024, with
 16 extensions beyond 21 days requiring approval by the Court;

17 **WHEREAS**, the Parties have agreed to extend the deadline for the Omnibus Sealing Stipulation
 18 and Omnibus Motions on Sealing Disputes (if necessary) from June 24, 2024 to July 8, 2024 in light
 19 of the voluminous record requiring substantial time for the Parties to meet and confer in an effort to
 20 reach agreement on as many sealing requests as possible;

21 **WHEREAS**, the extension of the deadline will not alter the date of any other event or any other
 22 deadline already fixed by Court order;

23 **THEREFORE**, the Parties hereby stipulate and agree as follows:

24 The deadline for the Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes
 25 (if necessary) currently scheduled for June 24, 2024 is extended to July 8, 2024. If additional time is
 26 required for the Parties to meet and confer to finish preparing these documents, the Parties will
 27 promptly seek the Court’s approval to extend the deadline beyond July 8, 2024.

[PROPOSED] ORDER

Having considered the Parties' Joint Stipulation and [Proposed] Order, the Court HEREBY ORDERS that deadline for the Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes (if necessary) is extended to July 8, 2024.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

The Hon. Yvonne Gonzalez Rogers
UNITED STATES DISTRICT COURT JUDGE

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

Pursuant to Civil Local Rule 5-1(i)(3) of the Northern District of California, I attest that concurrence in the filing of the document has been obtained from each of the other signatories to this document.

DATED: June 24, 2024

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Derek K. Kraft
Derek K. Kraft